

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

DALE ALAN DILL

No. 3:13-00045  
Chief Judge Haynes

MOTION TO CONTINUE TRIAL AND PLEA DATES

NOW COMES the defendant, Alan Dill, who through undersigned counsel, respectfully requests that this Honorable Court enter an order granting his motion for a continuance of the trial presently set for plea on July 29, 2013, and trial on August 6, 2013. The reasons for this motion are as follows:

1. 18 U.S.C. § 3161(h)(8)(A) provides, in pertinent part, that any period of delay resulting from a continuance granted on the basis of a court's findings that the ends of justice served by the granting of a continuance outweigh the best interest of the public and the defendant in a speedy trial shall be excluded in computing the time within which the trial must commence.

2. The factors which a judge shall consider in determining whether to grant a continuance are found in § 3161(h)(8)(B)(iv). One such factor is whether denial of a continuance would deny counsel for the defendant "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence."

3. A continuance of the trial is necessary so that undersigned counsel can engage needed expert services for this case. Due to budget cuts related to the budget sequester, the hiring of experts

*ORDER*  
*This motion*  
*IS GRANTED in*  
*the interests of*  
*justice to allow*  
*defense counsel*  
*to be prepared*  
*for*  
*trial.*  
*L. J. Haynes*  
*USMD*  
*7-22-13*